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July 21, 2008

Pephen Bergstein

Jen G. Ullrich

Hon. Mark D. Fox.
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

MEMO ENDORSED.

Re:

Zeno v. Pine Plains School District

07 Civ. 6508 (MDF)

Dear Judge Fox:

This firm represents plaintiff in the above-referenced case. A telephonic status conference has been scheduled for July 24, 2008 at 8:45 a.m.

Although discovery is scheduled to end on July 31, 2008, in advance of the telephonic conference, I am writing to request an additional two weeks, through August 15, 2008, to complete discovery. Although the parties have diligently pursued discovery in this matter, I have two remaining depositions. They were scheduled for this week, but I had to move them in anticipation of a trial in State court. Counsel for defendant and I have agreed that the first deposition will take place on August 1, and the second will take place on August 15. Consister the with this change in the discovery schedule, the parties further request that the summary judgment briefing schedule be adjusted accordingly.

Very truly yours,

Stephen Bergstein

cc: John Moore, Esq.

Via facsimile (518) 449-5517

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